

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA,)	CASE NO.: 3:18CR26
)	
Plaintiff,)	JUDGE JAMES G. CARR
)	
v.)	
)	
KARL ROGERS,)	<u>UNITED STATES OF AMERICA'S</u>
)	<u>NOTICE OF EXPERT WITNESSES</u>
Defendant.)	

Pursuant to Federal Rule of Criminal Procedure 16(a)(1)(G), the Government hereby provides notice that it may call the following expert witness at trial:

- **Brian Neil Levine, Professor at University of Massachusetts (Amherst), and Director of UMass Cybersecurity Institute.** Professor Levine was co-creator of the Freenet law enforcement tool that permits FBI agents and other law enforcement officers to determine statistically the original requestor and downloader of child pornography on the Freenet network. The Government provided in discovery his statement of qualifications and an article co-authored by Professor Levine regarding the Freenet law enforcement tool about which he will be testifying.
- **Jason Howell, Investigator, Ohio Internet Crimes Against Children Task Force, Cuyahoga County Prosecutor's Office.** Investigator Howell, who has extensive training in computer forensics, conducted the computer forensic examinations of the Defendant's electronic devices in this case and will be testifying as to his findings. Among other things, he located child pornography, the Freenet application, cleaners to wipe his electronic

devices, and encryptions to make it harder to access information on the devices. The Government previously provided his forensic report and his curriculum vitae in discovery.

Respectfully submitted,

JUSTIN E. HERDMAN
United States Attorney

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CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of January 2019, the foregoing document was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's system.

/s/ Tracey Ballard Tangeman
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